

I am in receipt of your letter dated January 18, 2008 in which you asked me to confirm that the San Diego County Democratic Party Federal Committee is not affiliated with the Democratic State Central Committee of California Federal. You also asked me to confirm the committee type. The San Diego County Democratic Party Federal Account is not affiliated with the Democratic State Central Committee of California Federal. The presumption contained in 11 CFR 110.3(b)(3) regarding affiliation of State party committees and subordinate committees does not apply because: (1) The San Diego County Democratic Party Federal Account is not established, financed, maintained, or controlled by any party unit; and (2) The San Diego County Democratic Party Federal Account does not make its contributions in cooperation, consultation or concert with, or at the request or suggestion of the Democratic State Central Committee of California Federal, or any other party unit or political committee established, financed, maintained, or controlled by another party unit. In response to your request that we clarify the committee type, the San Diego County Democratic Party Federal Account is a local party committee. A copy of this letter is being mailed today via overnight mail.

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